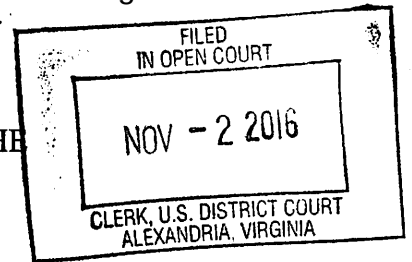


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Alexandria Division



UNITED STATES OF AMERICA

v.

SETH AARON THORNTON,

Defendant.

Criminal No. 1:16-CR-246

Count 1: 18 U.S.C. § 2252(a)(2)
Receipt of Child Pornography

Count 2: 18 U.S.C. § 2252(a)(4)(B)
Possession of Child Pornography

Forfeiture Notice: 18 U.S.C. § 2253

INDICTMENT

November 2016 Term – at Alexandria, Virginia

THE GRAND JURY CHARGES THAT:

COUNT 1

(Receipt of Child Pornography)

Between in or about August 2015 to in or about October 2015, in Fairfax County, Virginia, within the Eastern District of Virginia, the defendant, SETH AARON THORNTON, did knowingly receive any visual depiction of a minor engaging in sexually explicit conduct using any means and facility of interstate and foreign commerce, and that had been shipped and transported in and affecting interstate and foreign commerce, and which contained materials which had been mailed and so shipped and transported, by any means including by computer, to wit: SETH AARON THORNTON received on a Lenovo laptop computer videos and still images depicting minor and prepubescent children engaging in sexually explicit conduct including actual and simulated intercourse, masturbation, and the lascivious exhibition of the genitals and pubic area, that were contained on a Lenovo laptop.

(In violation of Title 18, United States Code, Section 2252(a)(2)).

THE GRAND JURY FURTHER CHARGES THAT:

COUNT 2

(Possession of Child Pornography)

On or about October 13, 2015, in Fairfax County, Virginia, within the Eastern District of Virginia, the defendant, SETH AARON THORNTON, did knowingly possess any visual depiction of a minor engaging in sexually explicit conduct that had been transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and which was produced using materials which had been mailed and so shipped and transported, by any means including by computer; to wit: SETH AARON THORNTON possessed on a desktop computer videos and still images depicting minor children, including prepubescent minors and minors who had not attained 12 years of age, engaging in sexually explicit conduct including actual and simulated intercourse, masturbation, and the lascivious exhibition of the genitals and pubic area.

(In violation of Title 18, United States Code, Section 2252(a)(4)(B)).

FORFEITURE NOTICE

THE GRAND JURY HEREBY FINDS THAT:

Defendant SETH AARON THORNTON, upon conviction for violating any of Counts 1 through 2, and as part of defendant's sentencing under Fed. R. Crim. P. 32.2, shall forfeit to the United States any and all matters which contain visual depictions of minors engaged in sexually explicit conduct in violation of the charged offenses; any property, real or personal, constituting or traceable to gross profits or other proceeds the defendant obtained from the above violations; and any property, real or personal, used or intended to be used in any manner or part to commit and to promote the commission of the aforementioned violations, including, but not limited to, the following items:

- 1) Cooler Wave Master desktop computer, S/N 04011305579, containing two Hitachi hard drives (S/N RE2KDXWE; S/N RE2J3KPA) and two Western Digital hard drives (S/N WCAU49322322; S/N WCAU49321818);
- 2) Lenovo laptop, S/N L3-ANT6T;
- 3) Seagate hard drive, S/N 7AD01TDT;
- 4) Black desktop computer tower containing two Hitachi hard drives (S/N RE2KDTXE; S/N RE2K57BE); one Seagate hard drive (S/N 1QK07H18); and two Western Digital hard drives (S/N WCANU1425218; S/N WCANL1080510).

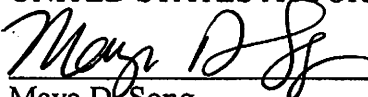
(In accordance with Title 18, United States Code, Section 2253).

A TRUE BILL
Pursuant to the E-Government Act,
the original of this page has been filed
under seal in the Clerk's Office.

Grand Jury Foreperson

DANA J. BOENTE
UNITED STATES ATTORNEY

By:



Maya D. Song

Assistant United States Attorney

James E. Burke IV

Special Assistant United States Attorney (LT)